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Attorneys for Plaintiff AXS Group LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,
Plaintiff,

v.

EVENT TICKETS CENTER, INC.,
VERIFIED-TICKET.COM,
AMOSA.APP and SECURE.TICKETS,
Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**DECLARATION OF J. MICHAEL
KEYES IN SUPPORT OF
PLAINTIFF'S REQUEST TO
APPEAR REMOTELY FOR
AUGUST 7, 2024 HEARING**

Honorable Sherilyn Peace Garnett

Date: August 7, 2024

Time: 1:30 p.m.

Courtroom: 5C

Amended Complaint filed: May 10, 2024

1 I, J. Michael Keyes, declare as follows:

2 1. I am an attorney duly admitted to practice law in the State of California.
3 I am a partner with the law firm Dorsey & Whitney, LLP, and counsel of record for
4 Plaintiff AXS Group, LLC in the above-captioned action. I make this declaration
5 based on my personal knowledge of the facts set forth herein and in support of
6 Plaintiff's Request to Appear Remotely for August 7, 2024 Hearing.

7 2. Plaintiff filed a Motion for Leave for Alternative Service on Defendant
8 Altan Tanriverdi (the "Motion") on June 21, 2024. The hearing for the Motion is
9 scheduled for August 7, 2024 at 1:30 p.m. in Courtroom 5C.

10 3. None of the Defendants filed an opposition or response to Plaintiff's
11 Motion.

12 4. Defendant Altan Tanriverdi has not appeared in this matter. I am
13 unaware of any counsel representing Defendant Altan Tanriverdi.

14 5. Counsel for Event Tickets Center Inc. indicated that it does not oppose
15 Plaintiff's request to appear remotely and that they would like to observe the
16 August 7, 2024 hearing remotely as well.

17 6. Counsel for Virtual Barcode Distribution LLC indicated that it would
18 not oppose Plaintiff's request to appear remotely if Plaintiff agrees to an extension
19 of time for it to respond to the Complaint.

20 7. Plaintiff did not agree to Virtual Barcode Distribution LLC's request
21 and sought clarification via email on whether Virtual Barcode Distribution LLC
22 intends to attend the hearing or has any objection to Plaintiff's remote appearance.
23 Counsel for Virtual Bard Distribution LLC did not respond to that request.

24 8. I reside in Spokane, Washington and will be in Spokane on August 7,
25 2024.

26 9. Connor Hansen, the senior associate representing Plaintiff in this case,
27 will be in Georgetown, Texas on August 7, 2024.

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1 I certify under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 This declaration was executed on August 2, 2024 in Spokane, Washington.

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5 By: /s/ J. Michael Keyes

J. Michael Keyes, SBN 262281

6 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281